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Zoom Meeting ID: 770-118-569



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Host: Brittaney.Andrews@wwfus.org
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SR Sara Roble-Guerrero (Me) [Mute](#) [Rename](#)

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Agenda

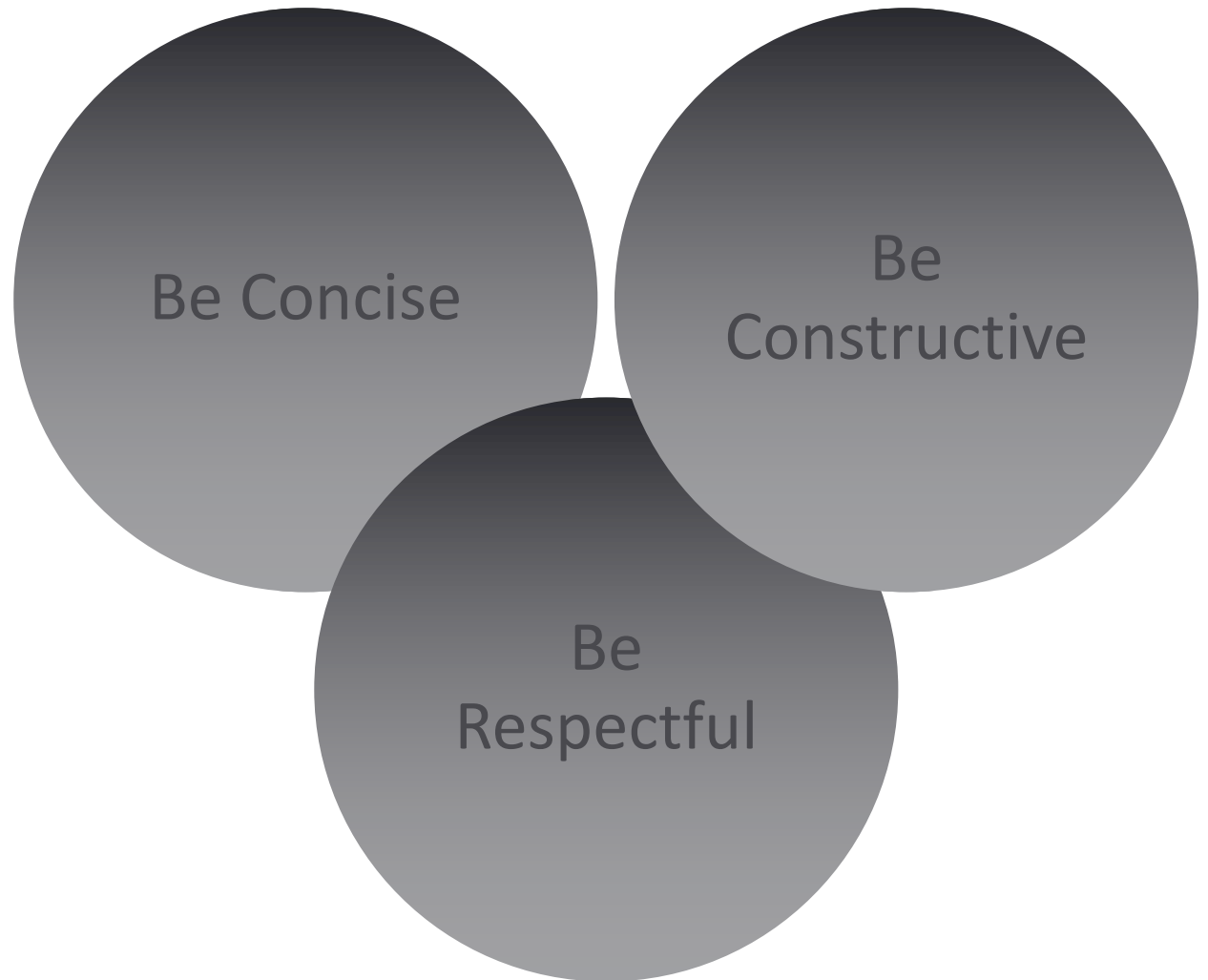


- 6:30 Welcome, Role Call, Agenda Review, Discussion Guidelines and Approval of April Meeting Summary
- 6:45 Presentation and discussion: Overview of EPA Superfund Process
- 7:15 Presentation and discussion: Current Investigations and Conditions at McLouth
- 8:00 Finalize Operating Procedures and Leadership Board
- 8:15 Public Comments (2-3 min max each)
- 8:25 Wrap Up, Next Steps and Action Items



Meeting Guidelines

Please follow these throughout the meeting so we can achieve the most productive outcomes





Approval of April Meeting Summary



McLouth Steel Superfund CAG

Introduction to EPA's Superfund Program

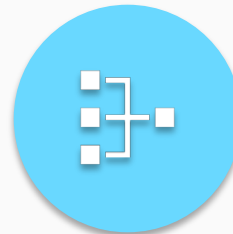
***Diane Russell**
U.S. EPA Region 5
Community Involvement Coordinator*

***McLouth CAG
May 2020***

Discussion



CERCLA and
Legal Framework



Superfund
Process

CERCLA



CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) was passed in 1980

- Providing authority for direct federal response to hazards posed by abandoned or uncontrolled hazardous waste sites.
- Also known as **Superfund**

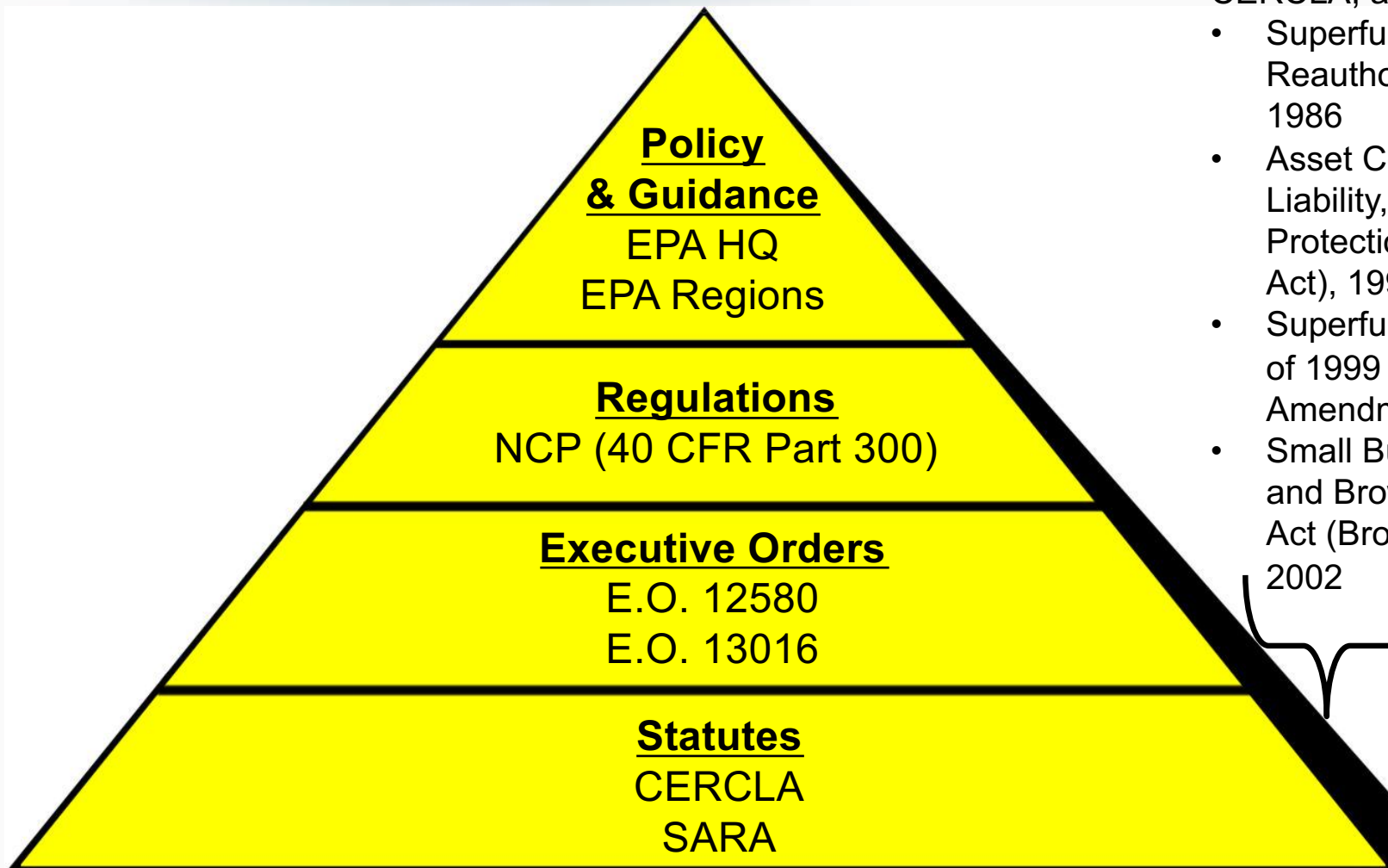
CERCLA



Goals of Superfund

- Protecting human health and the environment by cleaning up sites contaminated with hazardous substances
- Making responsible parties pay for work performed at Superfund sites
- Involving communities in the Superfund process
- Supporting the return of sites to productive use

EPA and Legal Framework



CERCLA, as amended by:

- Superfund Amendments and Reauthorization Act (SARA), 1986
- Asset Conservation, Lender Liability, and Deposit Insurance Protection Act (Lender Liability Act), 1996
- Superfund Recycling Equity Act of 1999 (SREA or Recycling Amendments)
- Small Business Liability Relief and Brownfields Revitalization Act (Brownfields Amendments), 2002

EPA and CERCLA



How Superfund Works

- The Superfund cleanup process is complex. It involves the steps taken to:
 - assess sites,
 - establish and implement appropriate cleanup plans.
- The blueprint for these activities is the **National Oil and Hazardous Substances Pollution Contingency Plan (NCP)**, a regulation applicable to all federal agencies involved in responding to hazardous substance releases.

EPA and CERCLA



Limitations of Superfund

- Limited to cleanup of hazardous substances and pollutants, such as
 - Polychlorinated biphenyls (PCBs)
 - Lead
 - Asbestos
 - Other toxic compounds
- Limited to cleanup of sites with unacceptable risks to human health and the environment
- Remedy section and cleanup standards applied to sites considering “reasonably anticipated future development”

Risk Happens When...

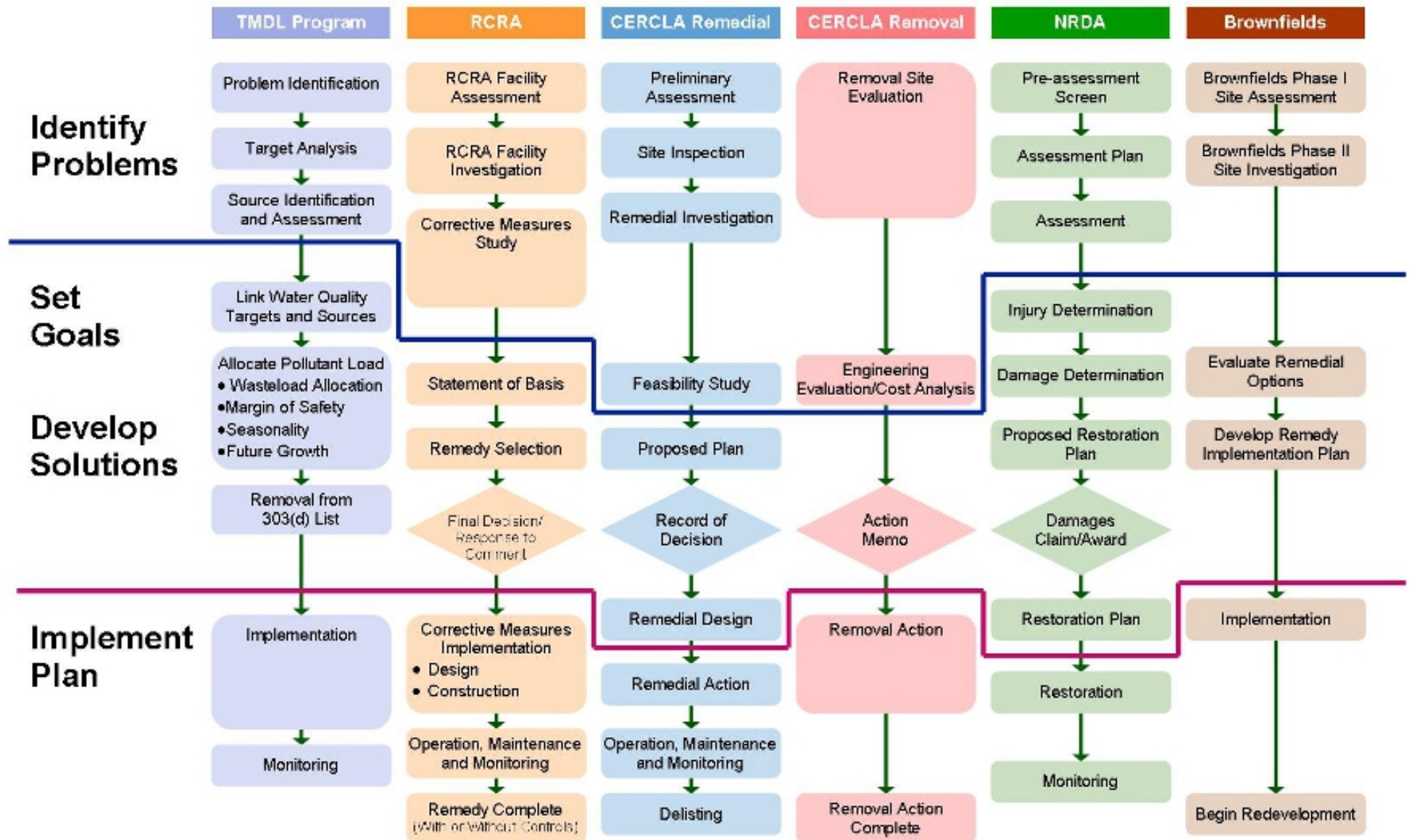


1. Contaminants exist
2. Concentrations are high enough

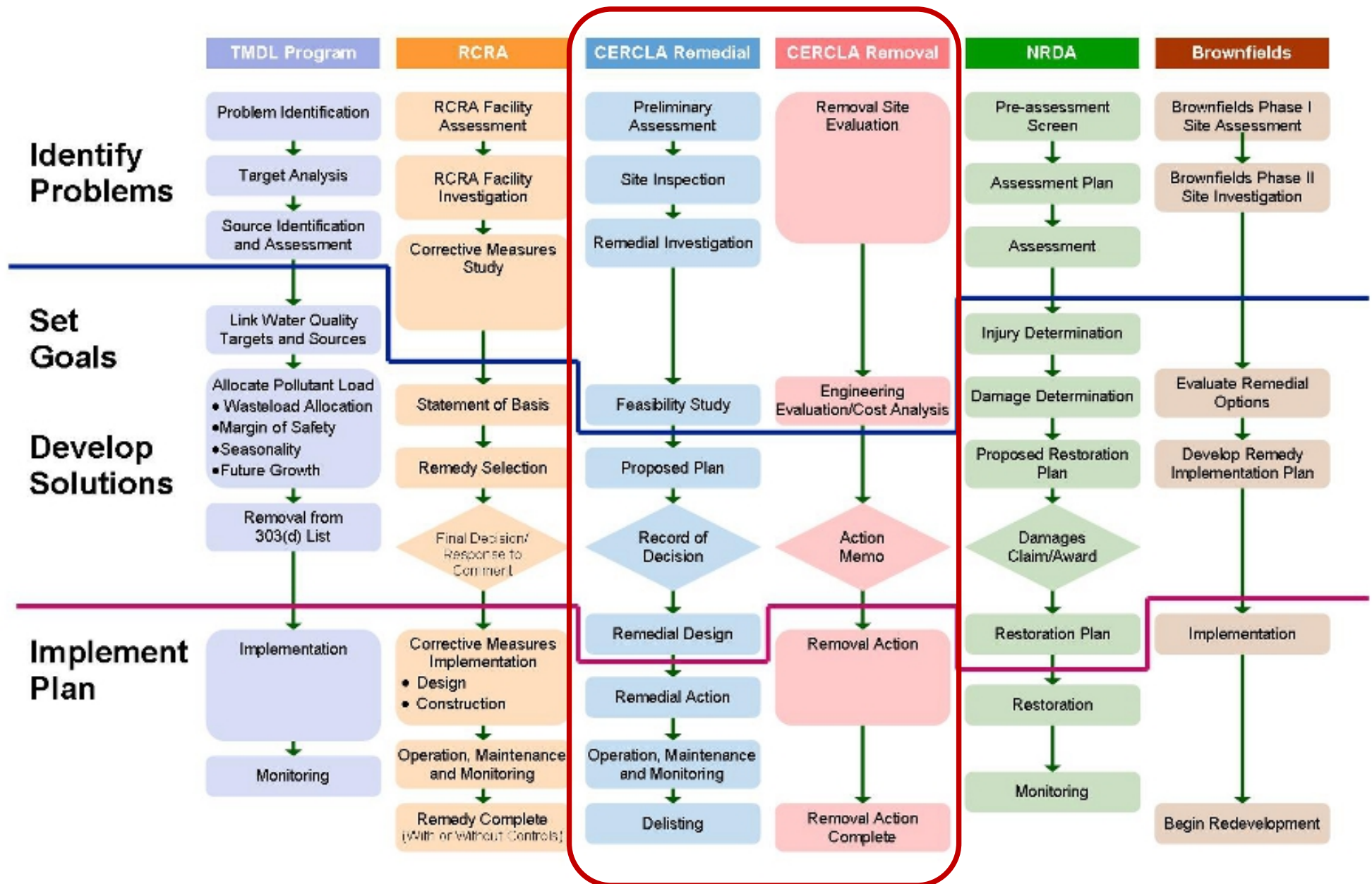
3. There is an exposure pathway

4. There are receptors (people, animals, a sensitive ecosystem)

EPA Assessment and Cleanup Programs



EPA Assessment and Cleanup Programs



Superfund Remedial Process



THE SUPERFUND REMEDIAL PROCESS



Removal actions can occur at ***any time*** and ***simultaneously***.
Reuse can occur at ***any time*** if human health and environment are protected.

Remedial Process: A Closer Look



THE SUPERFUND REMEDIAL PROCESS

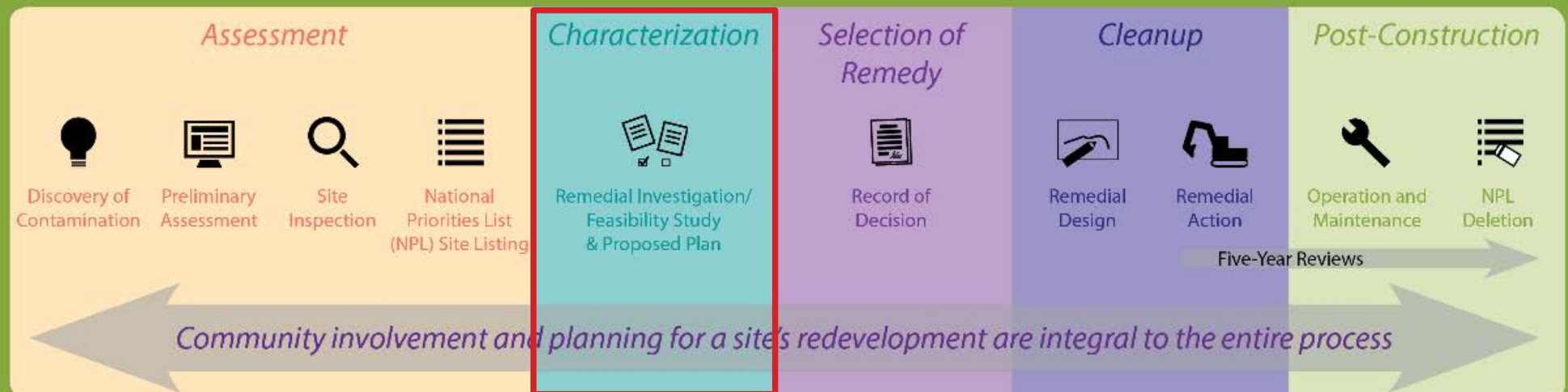


Characterization



- How much contamination is there? How do we clean it up?

THE SUPERFUND REMEDIAL PROCESS



Remedial Investigation (RI)



- The goal of the **remedial investigation** is to determine the extent of contamination and potential risks
 - It includes sampling of soil, surface water, groundwater and waste from locations across the site and near site boundaries
 - It assesses human health and ecological risks posed by the site



Remedial Investigation/Feasibility Study & Proposed Plan



What is Risk Assessment?



- Science-based site-specific estimate of the human health and/or ecological risk due to exposure to site contaminants
- Estimates **current and possible future risks**, if no cleanup actions taken
- Helps EPA select the best cleanup strategies to **manage risks to acceptable levels**

Feasibility Study (FS)



- The analysis of potential treatment methods or “cleanup alternatives” is called a **feasibility study**
- The pros and cons of each cleanup method are explored in relation to nine required evaluation criteria
- Based on results of the feasibility study, EPA will develop a Proposed Plan for site cleanup



Remedial Investigation/Feasibility Study & Proposed Plan





Investigation and Cleanup Activities

Southern Portion

2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
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MSC will demolish the buildings on the southern portion and begin cleanup of sludges and liquids.



Depending on federal funding, EPA will investigate the southern portion.



Depending on federal funding, a final cleanup plan will have been selected and the site cleaned up. (South Portion Complete)



Northern Portion

RTRR will investigate the northern portion with oversight by EGLE.



RTRR will implement cleanup under EGLE oversight. (North Portion Complete)





General Questions

- Diane Russell, Community Involvement Coordinator
 - (989) 395-3493
 - russell.diane@epa.gov
- Kirstin Safakas, Community Involvement Coordinator
 - (312) 886-6015
 - safakas.kirstin@epa.gov

Technical Questions

- Brian Kelly, On-Scene Coordinator
 - (734) 692-7684
 - kelly.brian@epa.gov
- Nabil Fayoumi, Remedial Project Manager
 - (312) 886-6840
 - fayoumi.nabil@epa.gov



Site Conditions

ECT Phase 1 (Environmental Site Assessment)
EPA Expanded Site Inspection
EPA Hazard Ranking System Document

Risk and Criteria

- What is substance?
 - What are the pathways of exposure?
 - Who or what could be exposed?
 - How can the exposure route be controlled?
 - What is the criteria – default or site specific risk assessment
-
- Substance X - Contaminated soil
 - Direct contact threat
 - Workers on the site that could be exposed
 - Stay out of that area and put up a fence, remove the soil, cap the soil
 - Default non-residential direct contact criteria or risk assessment

Phase 1

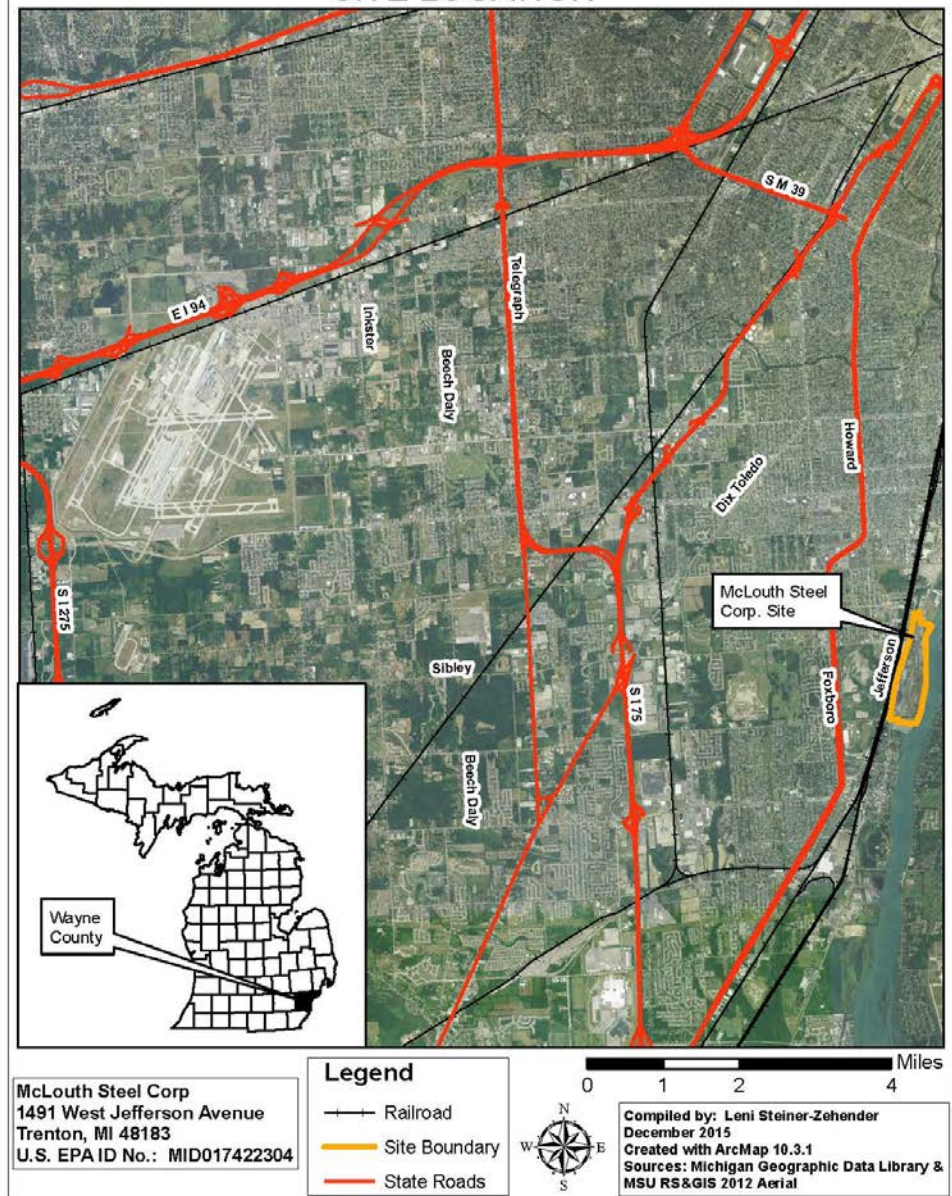
ECT for MSC- August 8, 2017

- 134 Recognized Environmental Conditions (RECs) divided into 5 areas
- Drums, transformers, pits, lagoons, asbestos pipe wrap, floor staining, ASTs, oily water in flooded basements, pickle liquor, PCBs in soil, pH plumes, dioxin in soil and river sediments.
- Many of these items are being addressed by the work MSC is doing.
 - May not be fully addressed - soils, sediments, and groundwater

Expanded Site Inspection Report 2017

Fieldwork 2015

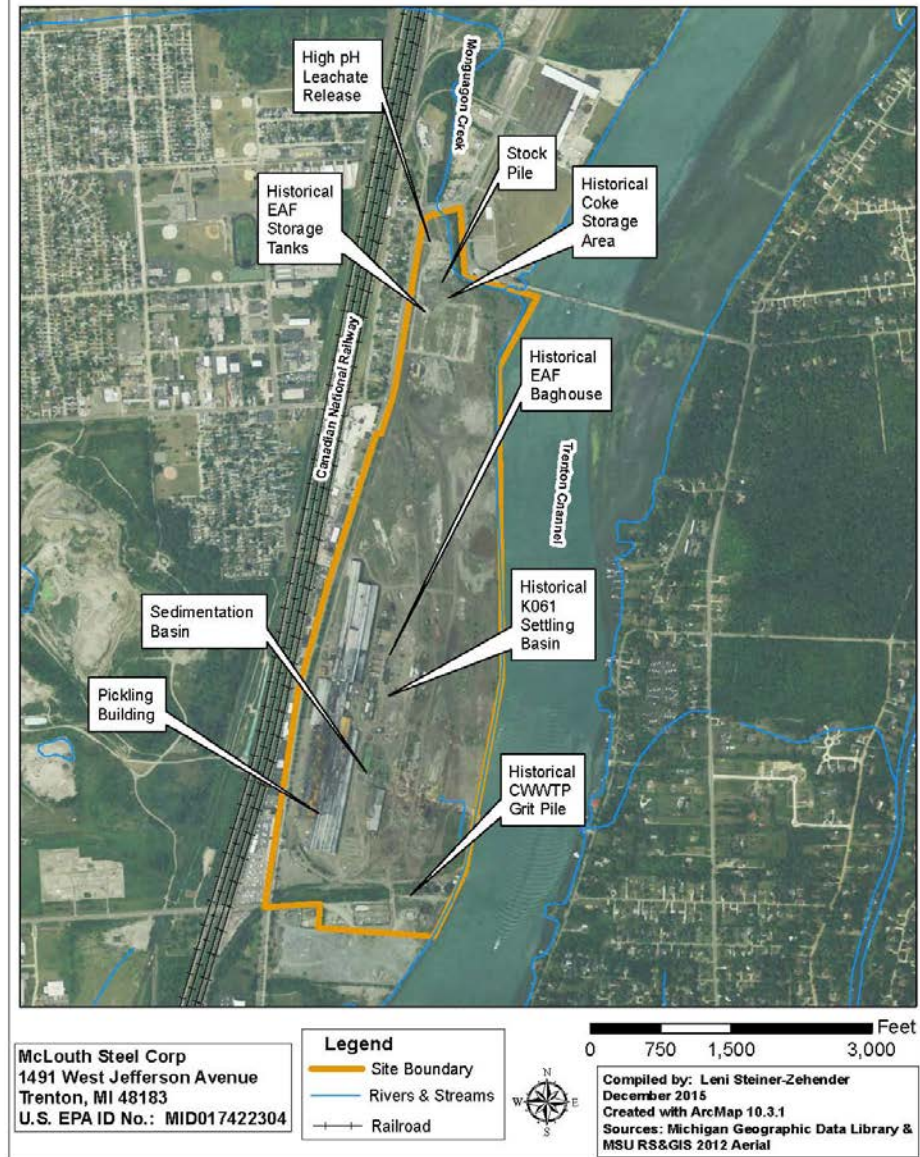
FIGURE 1
SITE LOCATION



Limited Investigation

Waste Piles 7
Surface Soils 13
Soil Borings 10
Groundwater 10
Surface water 4
Sediment 15

FIGURE 2
SITE FEATURES



Groundwater Table 13

VOCs
SVOCs
Pesticide
Inorganics

pH 0.85 -12.69

FIGURE 6
MONITORING WELL SAMPLING LOCATIONS



pH - potential of
hydrogen (hydrogen
concentration)

Scale 0-14.

7 is neutral

< pH is acidic

> pH is basic

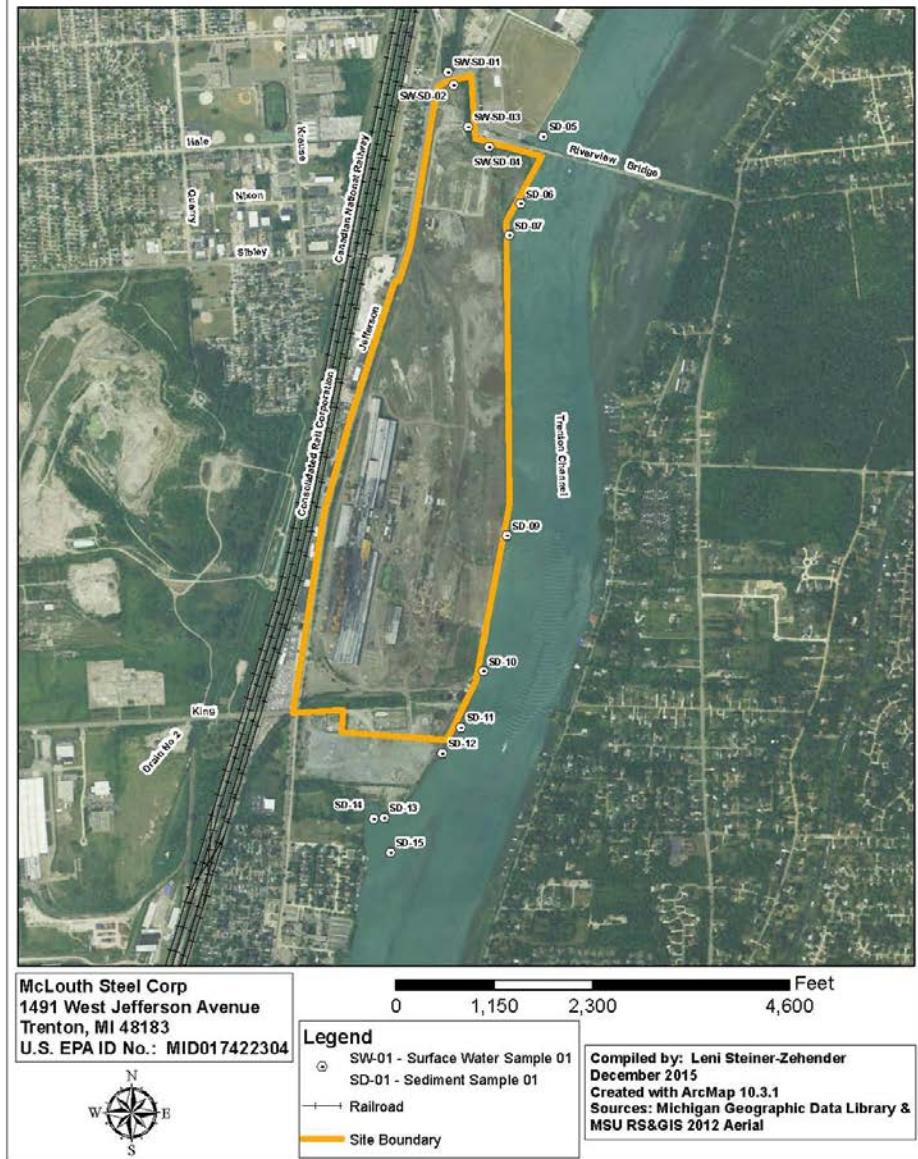
logarithmic - a change of
1 is ten times more acidic
or basic

McLouth Range (BEA)
0.85 to 12.69



Surface water Table 14 no detections

FIGURE 7
SURFACE WATER & SEDIMENT SAMPLING LOCATIONS



Monguagon Creek Sediments Table 15

Pesticide/PCBs
Inorganics

FIGURE 7
SURFACE WATER & SEDIMENT SAMPLING LOCATIONS

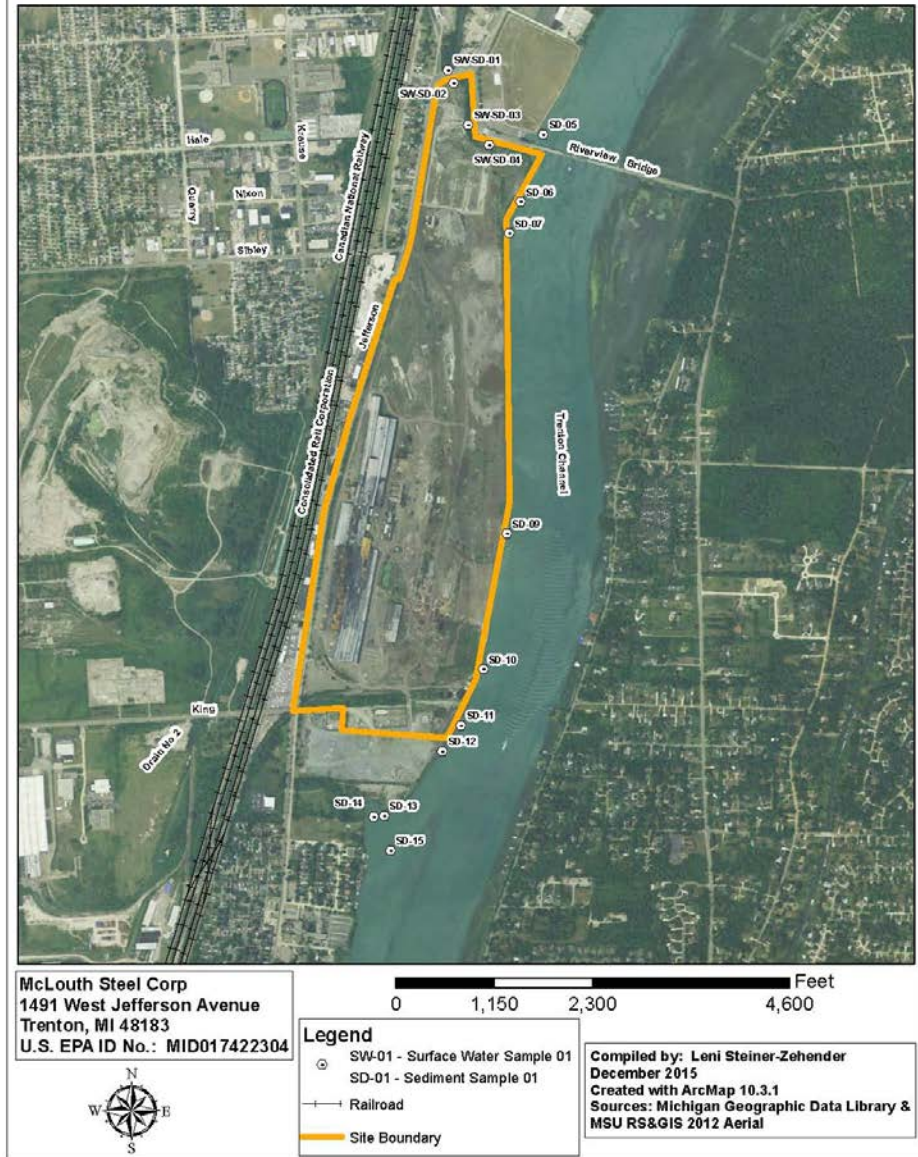


River Sediments

Table 15

VOCs
SVOCs
Pesticide/PCBs
Dioxins/Furans
Inorganics

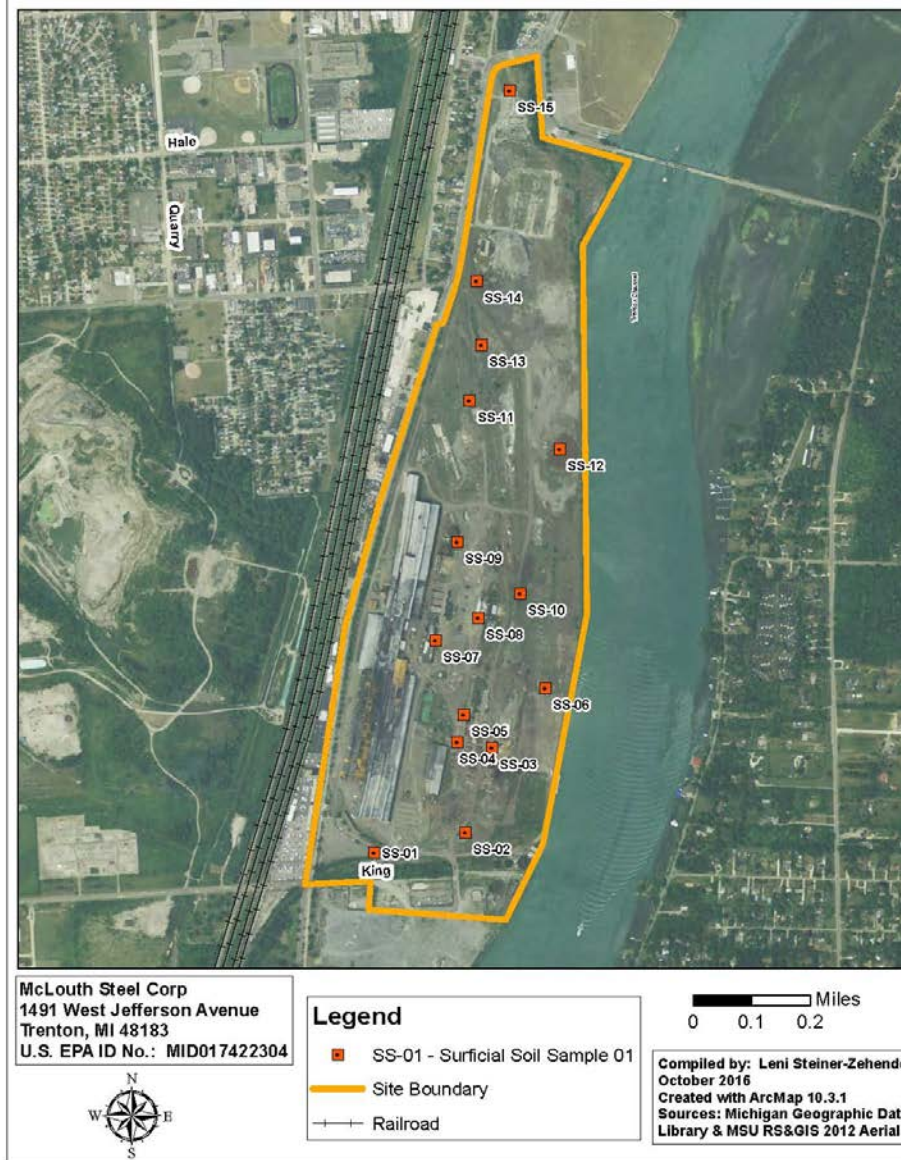
FIGURE 7
SURFACE WATER & SEDIMENT SAMPLING LOCATIONS



Surface Soil Table 16

VOCs
SVOCs
Pesticide
Dioxins/Furans
Inorganics

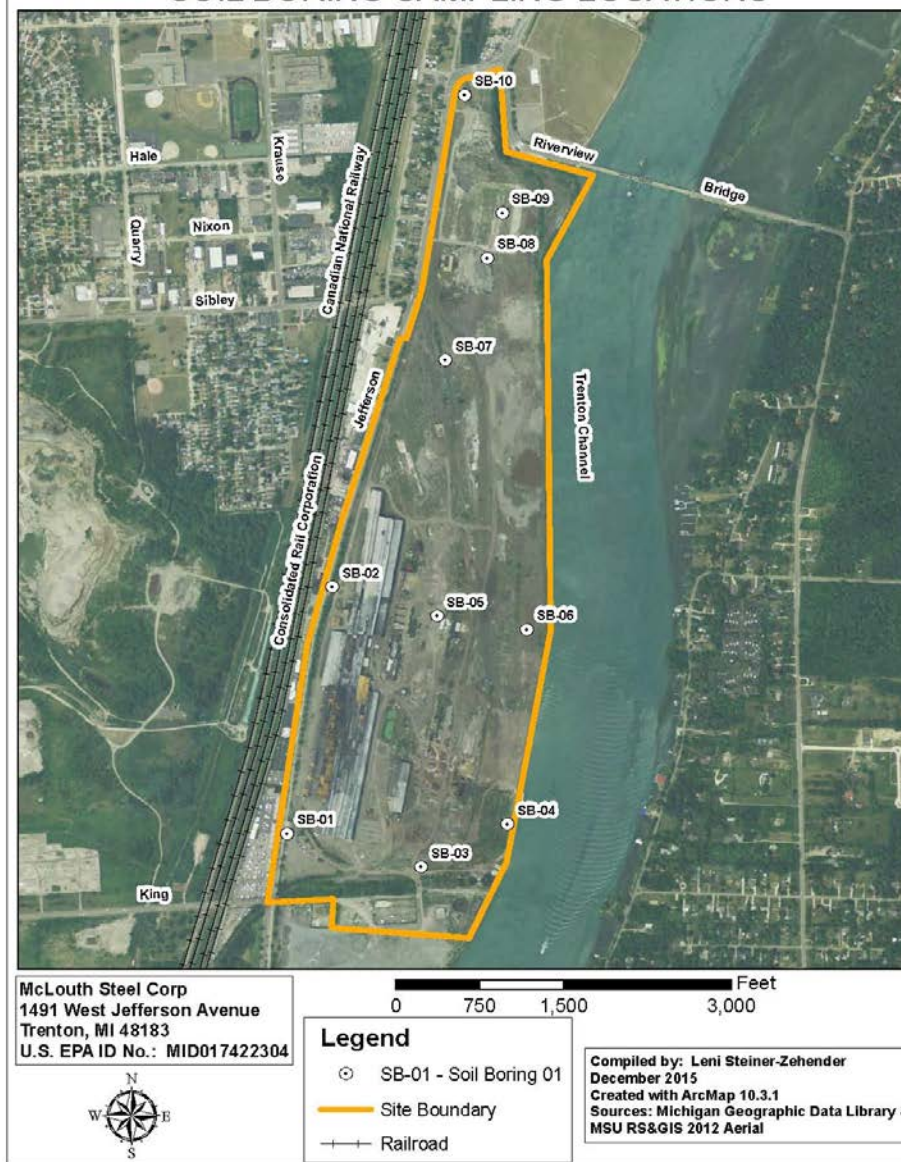
FIGURE 4
SURFICIAL SOIL SAMPLING LOCATIONS



Soil Borings Table 17

VOCs
SVOCs
Pesticide/PCBs
Inorganics

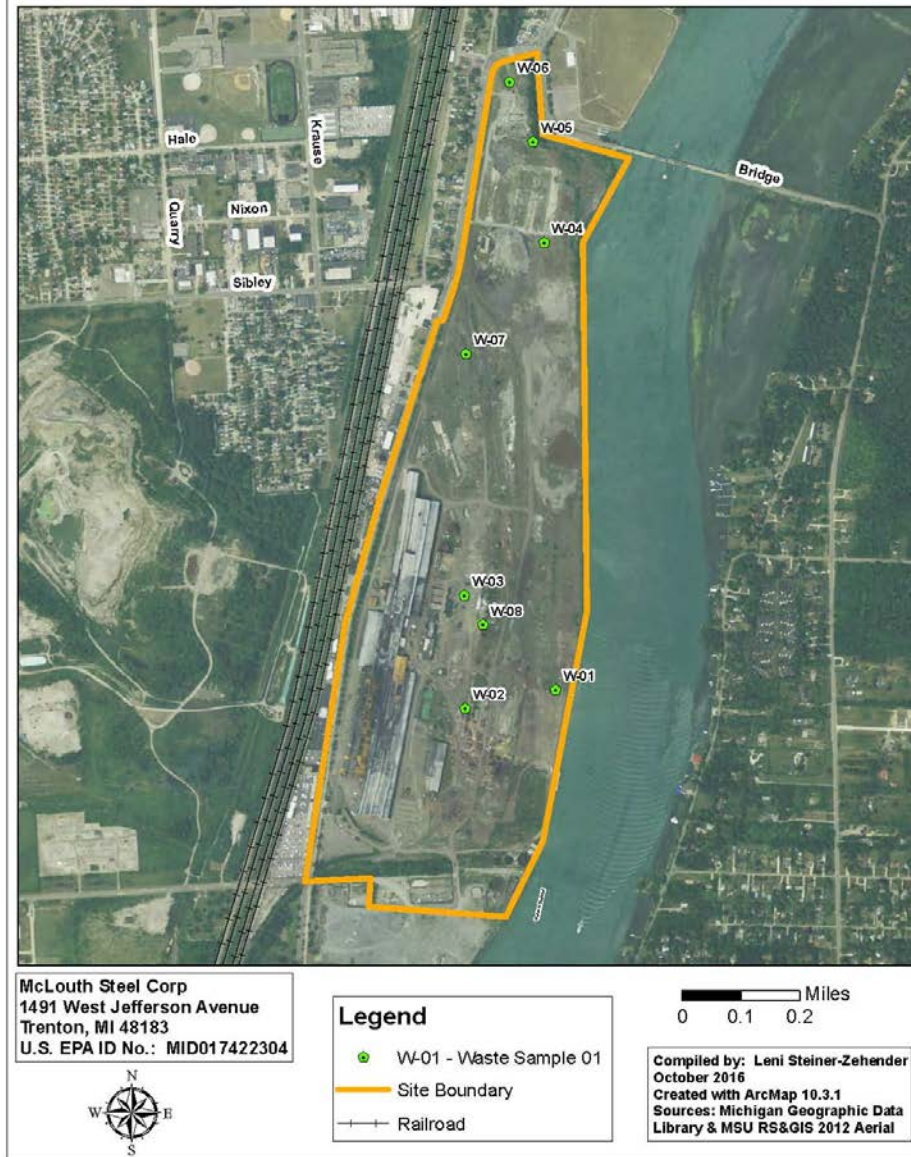
FIGURE 5
SOIL BORING SAMPLING LOCATIONS



Waste Samples Table 7

VOCs
SVOCs
Pesticide/PCBs
Inorganics

FIGURE 3
WASTE SAMPLING LOCATIONS



What was
learned. How
did it Score.

Ground Water Pathway - Not Evaluated

Surface Water Pathway - 100.00

Soil Exposure and Subsurface Intrusion
Pathway - Not Evaluated

Air Pathway - Not Evaluated

PCBs, dioxins and furans, metals, cyanide

The primary targets evaluated in the surface water migration pathway are fisheries and protected species and sensitive environments in the Trenton Channel of the Detroit River adjacent to the facility

Current Work Contribution to NPL Cleanup

Type of Waste	Cumulative
Friable ACM:	2,450 Yards (67 Truck Loads)
Galbestos Siding:	7,038,000 lbs
Const. & Demo Debris:	36,342,220 lbs
PCB Transformers:	9,33,600 lbs (85 Transformers)
Liquid Waste:	2,790,881 Gallons
Freon/Refrigerant Units:	70 units drained, recycled
K061 Liquid Waste	32,956 gallons
K061 Hazardous Waste:	8 Vac/roll-off Boxes
K062 Liquid Waste:	101,539 Gallons
K062 Solid Waste:	50 Cubic Yards
Non-Haz Solids	851.67 Yards

Current Site Conditions



- Site listed on NPL in May 2019; goal of every site is to be deleted from NPL
- Documented releases in the groundwater and surface water pathways
- Exposure to contaminated surficial soils is a concern at the site
- COCs: benzene, ethyl benzene, toluene, xylene, PCBs, PAHs, metals, dioxins, furans
- pH as low as 1.0 to as high as 13
- More data is needed for remedy selection

RI/FS Process



- RIFS start planned for July 2021; every remedial step/phase going forward will depend on the availability of federal funds
- RI characterizes the site and identify sources and potentially responsible parties
- FS develop and analyzes remedial action alternatives
- RI/FS supports selection of the remedy

RI/FS Process Continued



- Surface water pathway was a major exposure pathway of concern for the site
- Additional investigation/data needed for soils, subsoils, groundwater, and sediments (creek and river)
- Groundwater plume and sediments investigations are not limited to site boundary

Development of Cleanup Standards



- Risk-based and reflect the potential for human health or ecological risks from exposure to site's COCs
- Selected based on current land use (mixed zoning, re-development agreement between MSC and the County)
- Reasonably anticipated future land use
- Likelihood of future development with stricter cleanup standards?

9 Alternatives Evaluation Criteria



- Overall protection of human health and environment
- Compliance with applicable or relevant and appropriate requirements (ARARs)
- Long-term effectiveness and permanence
- Reduction of toxicity, mobility, or volume through treatment
- Short-term effectiveness
- Ability to implement
- Cost
- State acceptance
- Community acceptance

Proposed Plan/ROD



- Public Notice/comments period
- CERCLA requirements for remedy selection
 - Protect human health and the environment
 - Attain or waive ARARs
 - Be cost-effective
 - Use permanent solutions and treatment to the maximum extent practicable
 - Involve state in a substantial and meaningful manner
 - Consistency with the NCP



Thank you!

Nabil Fayoumi
EPA Remedial Project Manager
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312-886-6840

Questions?



Approval of Revised Operating Procedures



Leadership Board Nominees



- Wendy Pate, Trenton Visionaries
- Doug Thiel, Gross Ile Nature and Land Conservancy
- Brian Webb, Riverview Brownfields Authority
- Jim Wagner, City of Trenton



About CBI

CBI is a nonprofit organization with decades of experience helping leaders collaborate to solve complex problems.

Our staff are experts in facilitation, mediation, capacity building, citizen engagement, and organizational strategy and development. We are committed to using our skills to build collaboration on today's most significant social, environmental, and economic challenges. We work within and across organizations, sectors, and stakeholder groups.

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